## UNITED STATES OF AMERICA Before The POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

APR 27 4 05 PN '01

POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Experimental Presorted	)	Docket No. MC2001-1
Priority Mail Rate Categories, 2001	)	

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS: ROBERT F. KALENKA (OCA/USPS-T3-6)
(April 27, 2001)

Pursuant to sections 26 and 27 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate ("OCA") hereby submits an interrogatory and request for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-6 to witness Thomas M. Scherer dated March 23, 2001, are hereby incorporated by reference.

Respectfully submitted,

TED P. GERARDEN

Director

Office of the Consumer Advocate

EMMETT RAND COSTICH Attorney

1333 H Street, N.W. Washington, D.C. 20268-0001 (202) 789-6833; Fax (202) 789-6819 OCA/USPS-T3-6. Please refer to your testimony at page 6, lines 12-20.

a. According to your testimony, ADP is currently "negotiating with a competitor of the Postal Service for a guaranteed second-day delivery product." Are any of the pieces that are the subject of the negotiations currently mailed at Priority Mail rates? Please explain.

b. Please identify and describe with specificity any and all types of mail produced or processed by ADP for which there is a competitive service offered by an entity other than the Postal Service.

## CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Stephanie Ufallace
Stephanie Wallace

Washington, D.C. 20268-0001

April 27, 2001